

July 12, 2005

Dr. Ron DeHaven
United States Department of Agriculture
Animal and Plant Health Inspection Service
4700 River Road Unit 118 Station 3C71
Riverdale, MD 20737-1238

Dear Dr. DeHaven:

The National Pork Producers Council (NPPC) appreciates this opportunity to provide comments on the National Animal Identification System (NAIS) Draft Strategic Plan and Draft Program Standards, Docket Number 05-015-1. We appreciate the great effort made by APHIS to build and implement a NAIS, and encourage APHIS to continue working jointly with animal agriculture on the Systems' continued development.

Pork producers support the development and implementation of a mandatory animal ID system by 2008 for all relevant livestock species. The system should be compliant with the identification formats established by USDA in the NAIS for premises, individual animals and group/lot. It is important that the NAIS be species specific so existing identification and tracking systems can be utilized.

The NPPC believes the system currently proposed by USDA will not meet our desired goals. The current plan would take too long to implement, and would also be too expensive for complete implementation for all species at one time. USDA should realize that there are significant differences among species production systems that will delay the implementation of one national plan for all species.

Current attitudes on Capital Hill contend that a privately-held system should be driven forward by industry, thus avoiding the need for legislation that would likely be slow-moving. Additionally, confidentiality of producer data continues to be an issue for some producers. To some degree, this issue could be overcome by adapting an existing program with which producers are already comfortable and one which was developed as a producer initiative and supported by USDA.

Pork producers believe the goals of the NAIS can be more rapidly achieved if proper consideration is given to ideas which require the system to be species specific. The PRV Eradication Program, in use since 1988, requires the identification of swine and reporting of interstate movements via a Certificate of Veterinary Inspection (CVI) or an Interstate Movement Report (IMR). The adaptation of this existing program developed and

implemented by producers in cooperation with USDA, will track the majority of swine movements in the U.S.

The PRV-based system would need enhancements in some areas to make it fully operational. Adoption of the premises registration, individual animal and group/lot numbering formats as established by APHIS would be necessary. Additionally, the establishment of a protocol to individually identify cull breeding stock and animals not eligible for group/lot identification would need to be developed.

Accurate movement data will play a crucial role in a successful NAIS. Current interstate movement data is reported via a CVI or IMR, and international movements are reported as required on international health certificates. Intrastate movements and movements directly to slaughter are recorded as a normal part of business operations with that information being retained at the farm level. These records are made available to state and federal officials as needed to address animal health issues. State departments of agriculture do not currently have the resources to collect, manage and retain this data and thus rely on producer records to traceback animal movements. Until USDA Develops a plan with an established funding source, we do not believe producers should pay the cost of the forward reporting of these intrastate movements.

USDA has set the standards for the NAIS through the establishment of identification formats and delineation of the data necessary to achieve 48 hour traceback. Each individual species group should be required to develop a system to ensure that this information is collected in a manner that allows for access by designated state and federal officials as required to achieve the goals of the NAIS. USDA should certify these species-specific programs as to their compliance with the stated goals of the NAIS.

Again, NPPC appreciates this opportunity to comment on the National Animal Identification System (NAIS) Draft Strategic Plan and Draft Program Standards. We are thankful for the opportunity for pork producers to work in concert with USDA to develop such a program that is necessary to ensure the continued safety and security of the swine industry.

Sincerely,

A handwritten signature in dark ink that reads "Don Buhl". The signature is written in a cursive, slightly slanted style.

Don Buhl
NPPC President